

Renato C. Stabile
Attorney at Law
580 Broadway, Suite 400
New York, NY 10012
212-219-1469 (o)
212-219-1897 (fax)
917-204-0181 (mobile)
renato.c.stabile@gmail.com

January 26, 2024

VIA ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Juan Orlando Hernandez, et al*, 15 Cr. 379 (PKC)

Dear Judge Castel:

On January 23, 2024, the Court appointed me to represent Juan Orlando Hernandez, whose trial is scheduled to begin on February 12, 2024, so that I could assist Mr. Hernandez's current counsel, Raymond Colon. I write to request an adjournment of the trial for two reasons:

First,

[REDACTED]

[REDACTED]

[REDACTED]

Second, since I was appointed 3 days ago, I have learned that the volume of material I need to review is daunting and that there are procedural issues related to classified information in this case that are highly unusual, that complicate the representation. I also understand that there are documents and recordings in Spanish that have not all been translated. I do not speak Spanish. Now that I have a better sense of what is involved in this case, even under the best of circumstances, it would be extremely challenging to effectively assist Mr. Hernandez in such a short amount of time. For example, I have been in contact with discovery attorney Emma Greenwood's office regarding getting a copy of the discovery. It will be delivered to me tomorrow, Saturday, because it took *overnight* to copy all of the discovery onto the hard drive, because it is over a terabyte of information. To put that into perspective, a terabyte equates to approximately 85.8 million pages of text or 17,000 hours of audio. While I could obviously not be expected to review that material by February 12, I am concerned that reviewing even the most relevant portions will be impossible.

While I can effectively represent Mr. Hernandez given enough time to prepare, the combination of [REDACTED] and the particularities of this case compel me to ask for an adjournment to protect Mr. Hernandez's due process rights and right to the effective assistance of counsel. I know that the Court has worked very hard on the scheduling of this case, based on the discussions that were held at the January 23rd hearing. I deeply apologize to the Court for finding myself in these circumstances and the inconvenience I am causing to the Court, the Government, and the other parties. I searched myself to see if there was a way that I could keep the trial schedule consistent with my constitutional and ethical obligations to my client. But at this time, I request an adjournment of at least 90 – 180 days to help Mr. Colon further prepare for trial and provide effective assistance to Mr. Hernandez.

I thank the Court for its consideration.

Respectfully submitted,

/s/

Renato C. Stabile

cc: All counsel
via ECF